



**U.S. Department of Housing and Urban
Development**

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Washington, DC 20410
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Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: WA011 Renton Housing Authority Capital Fund and Operating Subsidy Proposed Activities for 2016 – 2020

Responsible Entity: City of Renton

Grant Recipient (if different than Responsible Entity): Renton Housing Authority

State/Local Identifier: WA011

Preparer: Lisa Grueter, Manager, BERK Consulting

Certifying Officer Name and Title: Mayor Denis Law and designee the Environmental Review Committee

Grant Recipient (if different than Responsible Entity): Renton Housing Authority

Consultant (if applicable): BERK Consulting, with Cultural Resource Consultants LLC, Landau Associates, and Weinman Consulting LLC

Direct Comments to:

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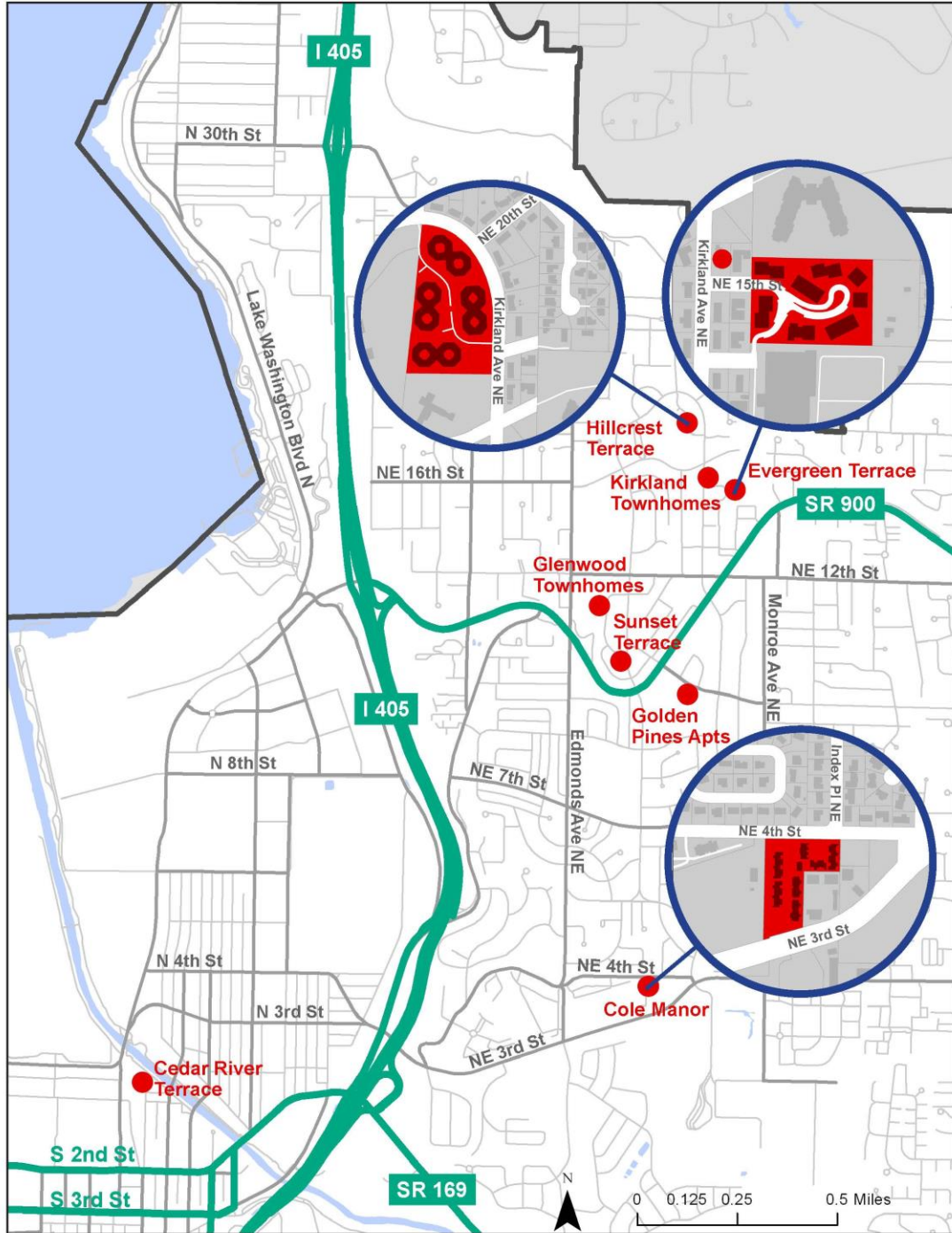
Project Location:

See Exhibit 1 for physical locations. Sites are listed below:

- Hillcrest Terrace 1442 Hillcrest Lane NE
- Evergreen Terrace 3027 NE 15th
- Cole Manor 2811 NE 4TH
- Sunset Terrace: generally bounded by Sunset Lane NE and Glenwood Avenue NE on the north, NE 10th Street on the east, NE Sunset Boulevard (State Route [SR] 900) on the south, and Edmonds Avenue NE on the west
- Glennwood Townhomes 1141 & 1147 Glennwood Avenue
- Kirkland Townhomes 1508 Kirkland Ave NE
- Golden Pines Apartments 2901 NE 10th
- Cedar River Terrace 51 Burnett Street

Exhibit 1. Renton Housing Authority Properties under Evaluation

Renton Housing Authority: Subsidized Properties



Date: July, 2016
Source: BERK, King County, City of Renton

Source: King County, City of Renton, BERK Consulting 2016

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The proposal consists of Renton Housing Authority's (RHA's) proposed Capital Fund and Operating Subsidy activities for 2016-2020. Activities include:

- Public Housing Authority-wide administration, operations, technical assistance, training, fees and costs, and delivery of services such as summer youth programs.
- Low Income Public Housing Authority-wide maintenance including appliance replacement, non-dwelling equipment and tools.
- Plans and designs of the Sunset Terrace Replacement Units (prior NEPA clearance in 2011).
- Maintenance, Rehabilitation, and Public Facility Improvements at Hillcrest Terrace, Evergreen Terrace, and Cole Manor.

See Attachment A Project Description for details.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The purpose and need for the proposal is the proper operation and administration of the Renton Housing Authority and its ongoing maintenance of low income public housing units and properties, as well as staff training and equipment, and programs for residents.

The rehabilitation and site improvements will increase the livability and accessibility of the dwelling units and sites by modernizing fixtures, removing asbestos containing materials, and removing ADA barriers including replacing sidewalks and adding ramps and other improvements.

Existing Conditions and Trends [24 CFR 58.40(a)]:

Without the project, dwellings and site improvements would continue to age and reach obsolescence, and sites would continue to be less convenient or safe to navigate for residents and pedestrians in the absence of sidewalk replacements or accessibility improvements.

Funding Information

RHA's Grant Number is WA 19PO 1150116. Exhibit 2 and Exhibit 3 identify the capital fund grant and operating subsidy over the 2016-2020 period.

Exhibit 2. Capital Fund Grant

Fiscal Year	Grant
WA01P011501-16 (FY 2016)	\$325,037
Estimated 2017	\$330,000
Estimated 2018	\$330,000
Estimated 2019	\$330,000
Estimated 2020	\$330,000

Source: US HUD District 10, Renton Housing Authority 2016

Exhibit 3. Operating Subsidy

Fiscal Year	Subsidy
2016	\$641,696
Estimate based on 2016 LIPH inventory 2017	\$600,000
Estimate based on 2016 LIPH inventory 2018	\$600,000
Estimate based on 2016 LIPH inventory 2019	\$600,000
Estimate based on 2016 LIPH inventory 2020	\$600,000

Source: US HUD District 10, Renton Housing Authority 2016

Estimated Total HUD Funded Amount:

See Exhibit 2 and Exhibit 3.

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:

No other funds are included except HUD funds. For the total project cost see Exhibits 1 and 2.

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No sites are in the Runway Protection Zone or Accident Potential Zone. The Cedar River Terrace site is located outside the area where height restrictions apply per FAR Part 77 of Renton Municipal Airport. It is located in the Traffic Pattern Zone (6); future development is subject to review and potential conditions regarding density, notice on titles, and other provisions. No new units or development are proposed on the subject site. See RMC 4-3-020 Airport Related Height and Use Restrictions. See worksheet in Attachment

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		B, RMC 4-3-020 Airport Related Height And Use Restrictions, and detailed height map Renton Municipal Airport Building Height Restrictions .
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Not applicable. Renton is not located on the marine coast.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Cedar River Terrace site is located in the 500-year floodplain but no critical actions are proposed; physical activities are limited to maintenance. See worksheet in Attachment B and map illustrating Zone X floodplain boundary (500 year floodplain).
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	The Puget Sound region is considered a maintenance area, and is not designated a non-attainment area. City of Renton regulations regarding construction apply and address dust and other matters; additional best management practices are recommended to control dust. No operational increases in traffic trips are anticipated as no dwellings are added. Puget Sound Clean Air Agency rules on Asbestos Control Standards apply.
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	The project is within the Washington coastal zone management area. The City of Renton submitted its request for consistency determination to the Washington State Department of Ecology (Ecology). See Attachment C Department of Ecology determination of consistency letter to City of Renton.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	This review found no evidence of known or suspected contamination at any of the three properties. Therefore, no additional investigation is warranted based on the project

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		as defined, and the information reviewed. However, if evidence of potential contamination is identified during project planning or execution, procedures should be implemented for sampling and analysis to evaluate the suspect material and provide for appropriate handling and disposal of the material to ensure protection of human health and the environment. See Attachment B including EDR report excerpts. Full EDR reports for the three sites where exterior site alterations are proposed (Hillcrest Terrace, Evergreen Terrace, and Cole Manor) are available with the Environmental Review Record.
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	The capital and operating subsidy projects considered in 2016 for Hillcrest Terrace, Evergreen Terrace, and Cole Manor are not anticipated to result in increased runoff beyond current conditions and would not have the potential to change pollutant loading relative to current conditions due to: application of surface water and aquifer protection standards in the Renton Municipal Code, no net increase in impervious area, and no new impervious surfaces accessible to vehicular traffic. Therefore no effect to listed fish species is anticipated. Based on a review of the Washington Department of Fish and Wildlife's Priority Habitats and Species database no listed wildlife species or critical habitat are found on the subject sites.
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	There are no above ground storage tanks within 1 mile of the sites where rehabilitation is proposed. See Attachment B including EDR report excerpts. Full EDR reports for the three sites where exterior site alterations are proposed (Hillcrest Terrace, Evergreen Terrace, and Cole Manor) are available with the Environmental Review Record.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Not applicable. Sites are already developed for urban use. See Attachment B.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Cedar River Terrace site is located in the 500-year floodplain but no critical actions are proposed. See worksheet in Attachment B and map illustrating Zone X floodplain boundary (500 year floodplain).
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	The project will not affect any previously recorded historic properties. See Attachment D. None of the proposed activities at Cole Manor and Hillcrest Terrace, nor the addition of the garbage recycling station at Hillcrest in March 2016, will affect aboveground historic properties. The Evergreen Terrace facility, built in 1968, was identified by DAHP as over 45 years in age and in need of review at the EZ-2 level. A short report form was provided to DAHP, and DAHP found that no historic properties will be affected by the current project as proposed in correspondence dated August 4, 2016.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	<p>Evergreen Terrace and Cole Manor are within 1,000 feet of principal arterials. .</p> <p>Evergreen Terrace at its closest point is about 285 feet from the SR 900 centerline, and Cole Manor is about 88 feet from the NE 3rd Street centerline west of Jefferson Avenue NE.</p> <p>Using HUD’s online tool, noise levels are acceptable for Evergreen Terrace (not exceeding 65 db). No mitigation is needed.</p> <p>Cole Manor is above 65 dB but not exceeding 70 dB, considered normally unacceptable for new construction; attenuation is encouraged for modernization. New construction of dwellings is not proposed.</p> <p>Since new concrete board siding is proposed between the eaves and current brick façade, it is recommended that the highest sound transmission class (STC) rated board that meets the capital program needs and resources be applied.</p>
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	<p>Cole Manor is located in the Cedar Valley sole source aquifer; see Cedar Valley 2 map. The project is not likely to affect Sole Source Aquifer quality. Sizes of residential structures will stay the same. Sizes of public facilities may slightly expand impervious area (e.g. ADA improvements). It is anticipated that sidewalk replacements will be pervious leading to no-net-increase in impervious area. Improvements are subject to the City’s aquifer protection regulations and surface water design manual, consist of non-pollutant generating surfaces, and are in locations served by public water, sewer, and storm drainage systems.</p>
Wetlands Protection Executive Order 11990,	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>There are no known wetlands on subject properties. See Attachment B and Wetlands and Water Classifications map.</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
particularly sections 2 and 5		
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	None of the project sites are within proximity of a Wild and Scenic River, based on a review of National Park Service information for Washington State .
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Proposed rehabilitation will improve the quality of the indoor environment for residents (e.g. removal of asbestos containing material), and will also improve access for elderly and disabled residents (e.g. ADA improvements). No adverse environmental impacts are anticipated.

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with	2	There will be no change in use of the subject sites; all are zoned

Plans / Compatible Land Use and Zoning / Scale and Urban Design		<p>for residential or mixed use/ residential-commercial purposes.</p> <ul style="list-style-type: none"> Hillcrest Terrace 1442 Hillcrest Lane NE: R-14 Evergreen Terrace 3027 NE 15th: Center Village Cole Manor 2811 NE 4th: RM-F Sunset Terrace, SR 900: Center Village Cedar River Terrace 51 Burnett Street: Center Downtown Glennwood Townhomes 1141 & 1147 Glennwood Avenue: R-14 Golden Pines Apartments 2901 NE 10th: Center Village Kirkland Townhomes 1508 Kirkland Ave NE: R-14 <p>Proposed capital projects would be compatible with the scale and pattern of existing land use.</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>Some areas of steep slopes are mapped on the Hillcrest Terrace and Evergreen Terrace sites. Moderate landslides are mapped in the Evergreen Terrace area. Stormwater systems serve all sites under review. See maps: Erosion Hazard, Landslide Hazard, Steep Slopes, and Storm Water. Where site disturbance is proposed for ADA improvements, sidewalk replacements, and similar exterior activities, the application of City regulations for critical areas, grading and erosion control, stormwater, landscaping, and related standards in Renton Municipal code Title IV will address any potential impacts. (See list under Mitigation Measures and Conditions below.)</p>
Hazards and Nuisances including Site Safety and Noise	3	<p>See Contamination and Toxic Substances and Noise Abatement above. With proposed mitigation, no impacts are anticipated.</p>
Energy Consumption	1	<p>Some maintenance and rehabilitation includes implementation of energy saving light bulbs.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	No implementation of economic uses and no displacement of businesses would occur.
Demographic Character Changes, Displacement	2	Units will be rehabilitated when vacated and made ready for new tenants. No displacement would occur.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	No facilities of this type will be added or displaced.

Commercial Facilities	2	No facilities of this type will be added or displaced.
Health Care and Social Services	1	Summer youth programs are proposed for funding.
Solid Waste Disposal / Recycling	2	Any construction will follow proper solid waste disposal per City codes (RMC 8-1). At Hillcrest Terrace and Cole Manor, collection and storage of solid waste will be more efficient.
Waste Water / Sanitary Sewers	2	All sites are served by sewers; no change in numbers of dwelling units is proposed and no impacts are anticipated. See: Wastewater .
Water Supply	2	All sites are served by the City's water system; no change in numbers of dwelling units is proposed and no impacts are anticipated. See: Drinking Water .
Public Safety - Police, Fire and Emergency Medical	2	All sites are served by the City's police and fire departments; no change in numbers of dwelling units is proposed and no impacts are anticipated. See: Fire Station Response Areas , and Police Department Patrol Areas .
Parks, Open Space and Recreation	2	Sites are served by the Renton Parks system. No change in numbers of dwelling units is proposed and no impacts are anticipated. It should be noted that a central park is to be added at Sunset Terrace, expanding and consolidating park area in the vicinity. See: Renton Trails and Bikeways Guide including parks.
Transportation and Accessibility	1	Sites are served by local and state roads (see Arterials); no dwellings are added and no increases in daily traffic are anticipated. Onsite ADA and sidewalk improvements will improve accessibility by the disabled and elderly.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	There are no onsite unique natural features. Water resources will be protected by the nature of the proposals (e.g. replacing sidewalks with pervious materials) and application of City stormwater requirements where applicable.
Vegetation, Wildlife	2	See endangered species above.
Other Factors	2	None.

Additional Studies Performed:

List of Attachments:

- A. Project Description
- B. Checklists Regarding 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

- C. Department of Ecology Coastal Zone Management Determination of Consistency Letter
- D. Cultural Resources Assessment for the Renton Housing Authority 2016 Capital Facility Program, Renton, King County, WA, Technical Memo, August 4, 2016, including Department of Archaeology and Historic Preservation Letter, No Historic Properties Affected, August 4, 2016

Field Inspection (Date and completed by):

No field investigation was conducted. Sites were reviewed by aerial photos in Google Earth.

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

Agencies:

Washington Department of Ecology, Coastal Zone Management (see Attachment C)
Washington Department of Archaeology and Historic Preservation (see Attachment D)
Duwamish Tribe (see Attachment D)
Muckleshoot Indian Tribe (see Attachment D)
Snoqualmie Indian Tribe (see Attachment D)
Renton Housing Authority, Mark Gropper, Sean McCarty
Schemata, Grace Kim, Guy Thomsen

Sources and Additional Resources Used:

See Attachment B regarding sources addressing 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities.

City of Renton Map Gallery

[Airport Area Elevations - South](#)

[Aquifer Protection](#)

[Arterials](#)

[Drinking Water](#)

[Erosion Hazard](#)

[Fire Station Response Areas](#)

[Flood Hazard](#)

[Landslide Hazard](#)

[Police Department Patrol Areas](#)

[Renton Trails and Bikeways Guide](#)

[Steep Slopes](#)

[Storm Water](#)

[Wastewater](#)

[Wetlands and Water Classifications](#)

[Zoning](#)

Environmental Protection Agency: Sole Source Aquifer Maps: [Cedar Valley 2](#)

King County iMap: <http://www.kingcounty.gov/services/gis/Maps/imap.aspx>

WSDOT - Freight and Goods: <http://wsdot.maps.arcgis.com/home/index.html>

WSDOT Community Planning Portal: <http://wsdot.maps.arcgis.com/home/index.html>

List of Permits Obtained:

The Hillcrest solid waste enclosure has received a Renton Building Permit. See Attachment B.

Requested clearances:

- Washington Department of Ecology: Certification of Consistency with Washington's Coastal Zone Management Program for Federally Funded Activities (See Attachment C)
- Department of Archaeology and Historic Preservation Letter, No Historic Properties Affected, August 4, 2016 (see Attachment D)

Programmatic maintenance and rehabilitation activities are subject to permits, including, but not limited to:

- City of Renton building permits
- City of Renton Grading permits
- City of Renton Routine Vegetation Management Permits
- Puget Sound Clean Air Agency Asbestos/Demolition Notification Forms

As presented capital and operating subsidy activities are exempt from SEPA under these rules:

- WAC 197-11-800 (1) Minor new construction, (2) Other minor new construction, (3) Repair, remodeling and maintenance activities, (6) Land use decisions, (14) Activities of agencies, (15) Financial assistance grants, and other relevant subsections of WAC 197-11-800.
- City SEPA rules in RMC 4-9-070, including but not limited to: RMC 4-9-070.G.1.b which exempts "landfills and excavations in WAC [197-11-800](#)(1)(b)(v): Up to five hundred (500) cubic yards or less."

Should grading or improvements or other activities exceed these thresholds, SEPA clearances will be required.

Public Outreach [24 CFR 50.23 & 58.43]:

A FONSI will be published in accordance with 24 CFR 58.43 - Dissemination and/or publication of the findings of no significant impact. Accordingly a 15-day comment period will be held.

Cumulative Impact Analysis [24 CFR 58.32]:

This Environmental Assessment has addressed the programs and activities of a 5-year capital facility plan and operating subsidy, aggregating a number of exempt, categorically excluded, and other activities subject to evaluation.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

The programmatic capital and operating proposals reflect categories of activities to meet federal, state, and local requirements and meet the needs of residents to maintain properties, improve accessibility under the ADA, remove obsolescent facilities and appliances, and remove hazards (asbestos containing materials).

The proposal does not involve unresolved conflicts concerning alternative uses of available resources.

Nevertheless, for the purposes of this evaluation, alternatives to exterior building alterations include: different siding materials than concrete board. The primary objective is to reside Cole Manor due to protect dwellings from the weather. Should a different material be appropriate to meet the objectives, it may be considered.

The following alternatives are identified for site improvements:

- Removing or relocating sidewalks instead of replacing them
- Moving solid waste facilities to other site locations
- Removing or relocating fencing instead of replacing it

Current sidewalks are buckling or in disrepair. Removing the sidewalks could remove hazardous conditions if they exist, but would not improve accessibility. Sidewalks are generally in locations where usage is desired; wholesale relocation may not provide comparable efficient access. However, under the proposal minor rerouting of sidewalks to avoid trees may occur when replacing the sidewalks.

Solid waste facilities are generally found in central locations for both residents and solid waste service providers who regularly collect the waste. Relocating them rather than replacing them could mean adding impervious areas in new locations rather than making use of current disturbed areas.

Removing fencing could make sites less secure in terms of uninvited visitors; relocating fencing may disturb new areas compared to replacing fencing.

No Action Alternative [24 CFR 58.40(e)]:

Under a No Action Alternative, maintenance, rehabilitation, and site improvements would not be implemented. Without the project, dwellings and site improvements would continue to age and reach obsolescence, and sites would continue to be less easy to navigate in the absence of sidewalk replacements or accessibility improvements.

Summary of Findings and Conclusions:

The proposals as designed and conditioned will not adversely impact natural or built environment conditions. Activities are compatible with the existing uses in the area. The proposed project also will not adversely impact existing resources or services in the area.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Mitigation Measures and Conditions

Law, Authority, or Factor	Mitigation Measure
Clean Air	<p>Comply with Puget Sound Clean Air Agency rules on Asbestos Control Standards. Responsible Party: Contractors.</p> <p>The City shall require all construction contractors to implement air quality control plans for construction activities in the project area. The air quality control plans should include best management practices to control fugitive dust and odors emitted by diesel construction equipment.</p> <p>The following BMPs will be used to control fugitive dust.</p> <ul style="list-style-type: none"> • Use water sprays or other non-toxic dust control methods on unpaved roadways. • Minimize vehicle speed while traveling on unpaved surfaces. • Prevent trackout of mud onto public streets. • Cover soil piles when practical. <p>Minimize work during periods of high winds when practical. The following mitigation measures will be used to minimize air quality and odor issues caused by tailpipe emissions.</p> <ul style="list-style-type: none"> • Maintain the engines of construction equipment according to manufacturers' specifications. • Minimize idling of equipment while the equipment is not in use. <p>Responsible Party: City of Renton and Contractors.</p>
Contamination & Toxic Substances	<p>No impacts are anticipated, but if evidence of potential contamination is identified during project planning or execution, procedures should be implemented for sampling and analysis to evaluate the suspect material and provide for appropriate handling and disposal of the material to ensure protection of human health and the environment.</p> <p>Responsible Party, Contractors.</p>
Historic Preservation	<p>No impacts to archaeological resources are anticipated. In the event that ground disturbing or other activities do result in the inadvertent discovery of archaeological deposits, work should be halted in the immediate area and contact made with DAHP in Olympia. Work should be halted until such time as further investigation and appropriate consultation is concluded. In the unlikely event of the inadvertent discovery of human remains, work should be immediately halted in the area, the discovery covered and secured against further disturbance, and contact effected with law enforcement personnel. Responsible Party, Contractors.</p>
Endangered Species, Surface Water,	A. Use pervious materials to replace sidewalks to offset any

Law, Authority, or Factor	Mitigation Measure
and Aquifer Protection Zones	<p>added impervious areas for public facility or site improvements (e.g. solid waste enclosures or ADA improvements), to achieve no-net-increase in site impervious areas. Alternatively, implement best management practices that achieve low impact development objectives and the surface water design manual standards.</p> <p>B. Reroute public facility improvements (e.g. replacement sidewalks) to retain trees. Alternatively replant trees if tree removal is necessary consistent with City standards (RMC 4-4-130).</p> <p>C. Comply with City surface water design manual as appropriate.</p> <p>Responsible Party: Renton Housing Authority.</p>
Coastal Zone Management Act	<p>Apply as appropriate for a permit or certification for State water quality requirements if exceeding state thresholds. Comply with City surface water design manual as appropriate under any circumstance. Responsible Party: Renton Housing Authority.</p>
Noise Abatement and Control	<p>At Cole Manor seek the highest sound transmission class rated siding that meets capital facility needs and resources. Responsible Party: Renton Housing Authority. (See Attachment B for links to guidance documents.)</p>

Code Authorities that Avoid Impacts:

City of Renton Municipal Code, Title IV

Chapter 4 CITY-WIDE PROPERTY DEVELOPMENT STANDARDS

4-3-050 CRITICAL AREAS REGULATIONS

4-4-030 DEVELOPMENT GUIDELINES AND REGULATIONS – GENERAL

4-4-040 FENCES, HEDGES, AND RETAINING WALLS

4-4-060 GRADING, EXCAVATION AND MINING REGULATIONS

4-4-070 LANDSCAPING

4-4-090 REFUSE AND RECYCLABLES STANDARDS

4-4-130 TREE RETENTION AND LAND CLEARING REGULATIONS

Chapter 5 BUILDING AND FIRE PREVENTION STANDARDS

Chapter 6, 4-6-030 DRAINAGE (SURFACE WATER) STANDARDS

Chapter 8 PERMITS – GENERAL AND APPEALS

Chapter 9 PERMITS – SPECIFIC

4-9-080 GRADING, EXCAVATION AND MINING PERMITS AND LICENSES
4-9-195 ROUTINE VEGETATION MANAGEMENT PERMITS

Determination:

☒ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]

The project will not result in a significant impact on the quality of the human environment.

☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]

The project may significantly affect the quality of the human environment.

Preparer Signature: _____

Lisa Grueter

Date: August 22, 2016

Name/Title/Organization: Manager, BERK Consulting

Certifying Officer Signature: _____

City of Renton Environmental Review Committee (ERC)

Date: 8/22/16

Signature: _____

Dorey Zimmerman

Signature: _____

C.E. [Signature]

Signature: _____

Kelly Bayne

Signature: _____

M.C. [Signature]

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).